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DISTRICT OF UTAH

BY: \_\_\_\_\_  
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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF UTAH, NORTHERN DIVISION

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TRENTON FEED COOPERATIVE, a Utah  
corporation; PLANTERS COTTON OIL  
MILL, INC., an Arkansas corporation,

Plaintiffs,

vs.

AMERICAN INTERNATIONAL GROUP,  
INC., a Delaware corporation; AMERICAN  
INTERNATIONAL SPECIALTY LINES  
INSURANCE COMPANY, an Alaska

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**JOINT NOTICE OF REMOVAL TO  
UNITED STATES DISTRICT COURT**

Judge Ted Stewart  
DECK TYPE: Civil  
DATE STAMP: 11/12/2003 @ 16:41:58  
CASE NUMBER: 1:03CV00131 TS

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corporation; AMERICAN  
INTERNATIONAL SURPLUS LINES  
AGENCY, INC., a New Jersey corporation;  
AIG TECHNICAL SERVICES, INC., a  
Delaware corporation; and AG STATES  
AGENCY, L.L.C., a Minnesota limited  
liability company,

Defendants.

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**TO: THE HONORABLE JUDGES OF THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH, NORTHERN DIVISION:**

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. § 1441 and 28 U.S.C. § 1332, the defendants American International Group, Inc., American International Specialty Lines Insurance Company, American International Surplus Lines Agency, Inc., and AIG Technical Services, Inc., by and through their counsel of record, Gary L. Johnson and Ramona E. Garcia of RICHARDS, BRANDT, MILLER & NELSON, and AG States Agency, L.L.C., by and through its counsel of record, Michael Skolnick of KIPP AND CHRISTIAN, (hereinafter “removing defendants”) have removed the civil action pending against them in the First Judicial District Court, in and for Cache County, State of Utah, to this Honorable Court. The removing defendants allege the following grounds for removal:

1. On or about October 9, 2003 plaintiffs filed a Complaint in the First Judicial District Court, in and for Cache County, State of Utah, civil number 030101898 CN (hereinafter the “state court action”). Service was effected on two of the AIG related defendants

on October 13, 2003 (American International Surplus Lines Agency, Inc. and AIG Technical Services, Inc.). Service was effected on the remainder of the defendants after October 13, 2003.

2. Plaintiff Trenton Feed Cooperative is a Utah corporation with its principal place of business in the State of Utah.

3. Plaintiff Planters Cotton Oil Mill, Inc., is an Arkansas corporation with its principal place of business in the State of Arkansas.

4. Defendant American International Group, Inc. is a Delaware corporation with its principal place of business in the State of New York.

5. Defendant American International Specialty Lines Insurance Company is an Alaska corporation with its principal place of business in State of New York.

6. Defendant American International Surplus Lines Agency, Inc., is a New Jersey corporation with its principal place of business in the State of New Jersey.

7. Defendant AIG Technical Services, Inc., is a Delaware corporation with its principal place of business in the State of New York.

8. Defendant AG States Agency, L.L.C., is a Minnesota limited liability company with its principal place of business in St. Paul, Minnesota.

9. This Court has jurisdiction of the above-entitled action pursuant to 28 U.S.C. § 1332 because there is complete diversity of citizenship between plaintiffs and all defendants, and hence this action may be removed to this Court pursuant to 28 U.S.C. § 1441.

Plaintiffs' claims against the removing defendants exceeds \$75,000.00 exclusive of interest and costs.

10. A copy of the Complaint in the state court action is attached as **Exhibit 1**, and a copy of the Notice of Filing of Notice of Removal to United States District Court is attached as **Exhibit 2**.

11. The District Court for the First Judicial District, Cache County, State of Utah, is located within this Court's jurisdiction.

12. The earliest service on at least one of the removing defendants was October 13, 2003 and, therefore, removal is timely under 28 U.S.C. § 1446. All defendants join in this Notice of Removal.

13. Removing defendants have filed a copy of this Joint Notice of Removal to United States District Court with the Clerk of the First Judicial District Court, Cache County, State of Utah.

14. Defendant AG States Agency, L.L.C. by and through its counsel of record, Michael Skolnick of KIPP AND CHRISTIAN, joins in this Notice of Removal.

WHEREFORE, removing defendant notify this Court, plaintiffs, and the District Court for the First Judicial District, Cache County, State of Utah, that this action has been removed to the United States District Court for the District of Utah, Northern Division.

DATED this 12<sup>th</sup> day of November, 2003.

RICHARDS, BRANDT, MILLER  
& NELSON

  
\_\_\_\_\_  
GARY L. JOHNSON  
RAMONA E. GARCIA

*Attorneys for Defendants American International  
Group, Inc., American International Specialty  
Lines Insurance Company, American  
International Surplus Lines Agency, Inc., and  
AIG Technical Services, Inc.*

KIPP AND CHRISTIAN

  
\_\_\_\_\_  
MICHAEL SKOLNICK

*Attorneys for Defendant AG States Agency, L.L.C.*

**CERTIFICATE OF SERVICE**

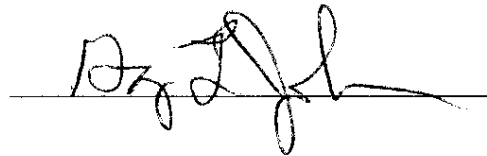
I HEREBY CERTIFY that a true and correct copy of the foregoing instrument was mailed, first-class, postage prepaid, on this 12<sup>th</sup> day of November, 2003, to the following:

Douglas J. Parry  
Jennie B. Garner  
PARRY ANDERSON & GARDINER  
60 East South Temple, Suite 1270  
Salt Lake City, Utah 84111

*Attorneys for Plaintiffs*

Michael Skolnick  
KIPP AND CHRISTIAN  
10 Exchange Place, Suite 400  
Salt Lake City, Utah 84111

*Attorneys for Defendant AG States Agency, L.L.C.*

A handwritten signature in black ink, appearing to read "Michael Skolnick", written over a horizontal line.

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Exhibits/  
Attachments  
to this document  
have **not** been  
scanned.

Please see the  
case file.